

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

Plaintiff,
VS.

Judge J. Nicholas Ranjan

Defendants.

Fed. R. Civ. P. 26(f) REPORT OF THE PARTIES

1. **Subjects of Fact Discovery:**

2. **Subjects of Expert Discovery:**

3. **Can fact and expert discovery occur at the same time? Why/why not?**

4. **Pre-trial Deadlines:**
 - a. Date for Initial Disclosures:

- b. Date for joinder/amendment:
 - c. Date for close of fact discovery:
 - d. Date for close of expert discovery, if bifurcated:
5. **Do the parties want a Rule 502 non-waiver order – Yes or No?**
6. **Are there any ESI issues to address? If yes, please explain:**
7. **Protective Order – Yes or No? If yes, please explain:**

Respectfully submitted,
